



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

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Governor

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Secretary of Natural Resources

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Thomas L. Hopkins
Director

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April 1, 1997

Commander
Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street
Attn Mr. Dave Forsythe, CODE 1822
Norfolk, Va. 23511-2699

RE: CD Landfill Site, ou 2, site 6

Dear Mr. Forsythe:

This letter is in response to concerns raised by the Tier 1 Norfolk Naval Base Partnering Team concerning capping issues at the CD landfill. Based on the landfill having received hazardous waste in 1981 (in the form of blast grit failing EP Toxicity test for lead and cadmium), RCRA requirements are applicable to the unit.

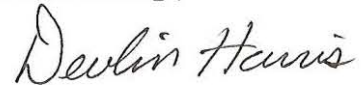
However, if the waste in the landfill no longer exhibits the characteristic of toxicity (VHWMR § 3.9A.) then the waste would be considered a solid waste, and the landfill can be closed under solid waste regulations.

In order to determine if the waste in the landfill exhibits the characteristic described in VHWMR §3.9.A, and table 3-2, a Toxicity Characteristic Leaching Procedure (TCLP method 1311) needs to be done for the analytes of concern, namely cadmium and lead (D006 and D008). Appendix 3.3 of the VHWMR describes the scope and application and a summary of the method. Additionally, EPA's Test Methods for Evaluating Solid Waste, SW-846, chapter nine gives guidance on the appropriate number of samples to be collected in order to do a TCLP.

Once the facility can demonstrate that the waste is no longer characteristic, and decides to close the landfill under solid waste regulations, the next step in the process is to apply to DEQ for a post-closure care permit. The post-closure care requirements focus on groundwater monitoring.

If you have any questions, please feel free to contact me at
(804) 698-4226.

Sincerely,

A handwritten signature in cursive script that reads "Devlin Harris".

Devlin Harris
Environmental Engineer Sr.

cc: Durwood Willis, DEQ
Erica Dameron, DEQ
Leslie Romanchik, DEQ
Harry Harbold, EPA